



Your Guide to Compliant Medicare Call Recording with CallVault

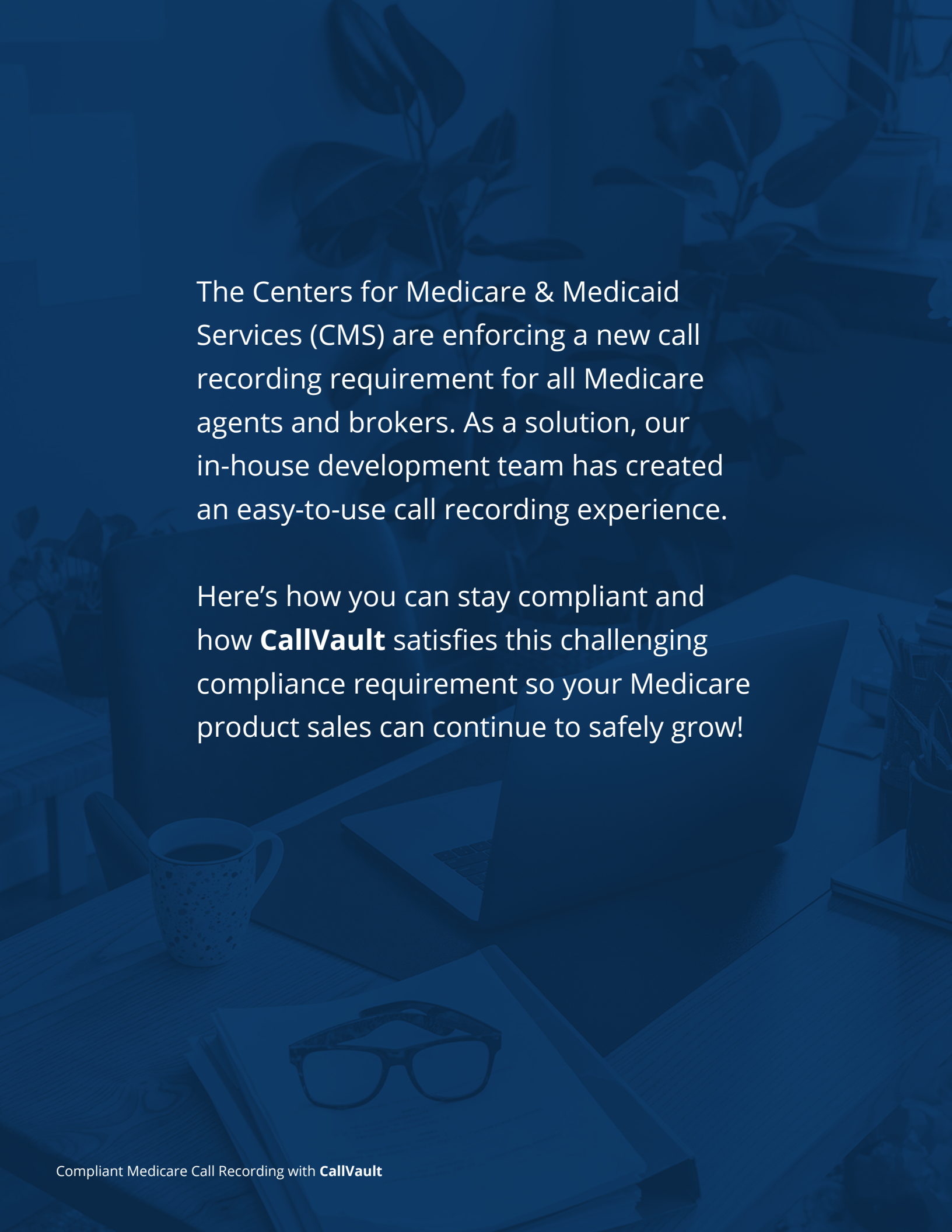
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The background is a blue-tinted photograph of a desk. In the foreground, there is a laptop, a patterned mug, and a pair of glasses. In the background, there are some plants and a desk lamp.

The Centers for Medicare & Medicaid Services (CMS) are enforcing a new call recording requirement for all Medicare agents and brokers. As a solution, our in-house development team has created an easy-to-use call recording experience.

Here's how you can stay compliant and how **CallVault** satisfies this challenging compliance requirement so your Medicare product sales can continue to safely grow!



Insurance Agents as TPMOs: What CMS Compliance Regulations Mean for You

CMS implemented requirements that will impact your business.

What Are Third-Party Marketing Organizations (TPMOs)?

CMS now defines TPMOs as “organizations that are compensated to perform lead generation, marketing, sales, and enrollment related functions as a part of the chain of enrollment.”

By this definition, CMS considers **all insurance agents and brokers** to be TPMOs, meaning that insurance agents and brokers must adhere to all CMS' TPMO rules and guidelines.

TPMO Compliance Requirements

Chief among CMS' TPMO directives is **mandatory recording of Medicare Advantage- and PDP-related calls** with beneficiaries in their entirety. Agents must also use a [standard disclaimer](#).

In their 2024 Final Rule, CMS clarified that TPMOs must only record marketing, sales, and enrollment calls. "Marketing" includes retention marketing, or influencing a beneficiary's decision to stay enrolled in a plan. They also stated that the call recording requirements apply to virtual calls (e.g., video calls) as well (only the audio portion). [View our summary on the 2024 Final Rule changes here.](#)

Our Plan to Help Agents Record Medicare Calls

Here at Ritter Insurance Marketing, we strive to not only keep agents up to date with any compliance changes, but also develop solutions to help them adhere to imperative guidelines.

Introducing **CallVault** for Compliant Medicare Call Recording

CallVault is an enhancement that has been added to our collection of proprietary sales tools within our comprehensive agent dashboard, the [Ritter Platform](#). This tool enables the recording and storing of all calls with Medicare beneficiaries easily and securely.

Registration for and use of Ritter's Platform is free.

Sign up in just minutes today!





CallVault: How Does It Work?

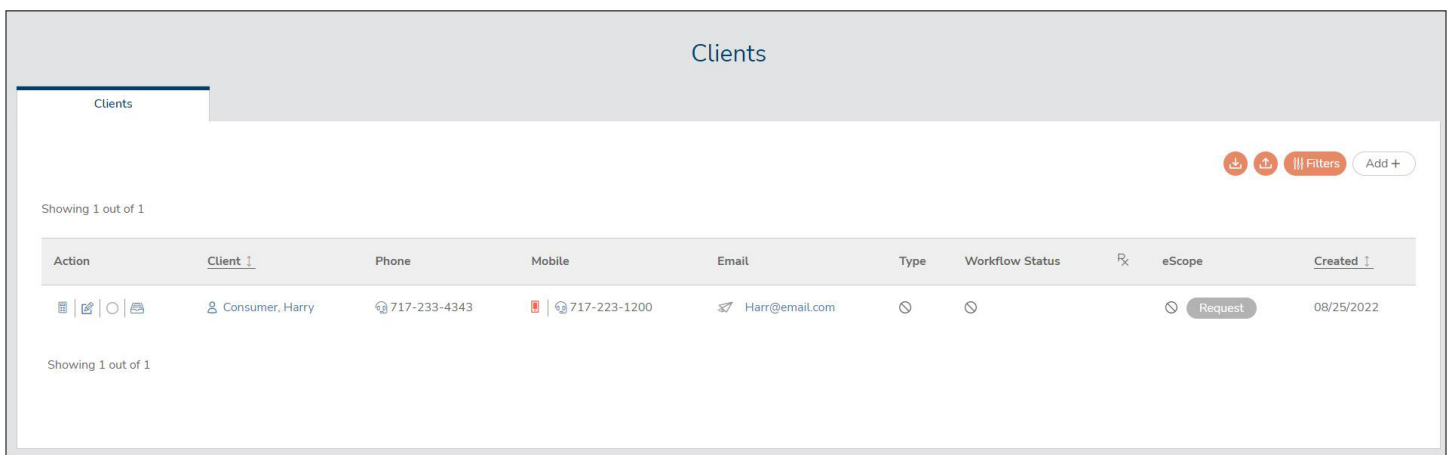
CallVault equips agents to record and store **both outbound and inbound calls**, including plan presentations. You can seamlessly access the outbound calling capability through the Platform's **Clients** tab and generate an inbound phone number in seconds from your agent profile.

Note: *In order to make or receive calls using **CallVault**, you must have a valid phone number listed in your Platform account. **CallVault** is available today to all registered agents.*

Making CallVault Outbound Calls

Starting an outbound recorded call is as easy as three steps:

1. Log in to the Ritter Platform
2. Enter the **Clients** tab
3. Click the **Headset** icon next to the phone number listed under **Phone** or **Mobile** in your client list

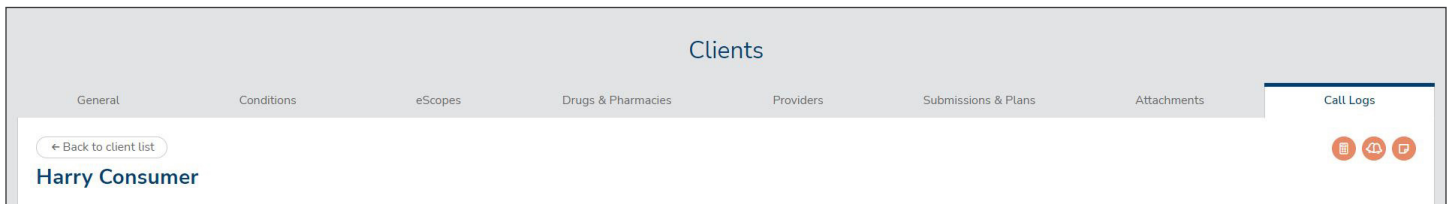


Behind the scenes, call recording is completed through the use of the trusted third-party recording app, Twilio. Once you initiate a call through a client's record in the Platform and click **Start Recorded Call**, the app sets up a recorded line. This call flow is a simple process.

- Twilio calls you, the agent
- You accept the call and press a keystroke to prompt connection to your client
- Twilio calls the client
- Client accepts the call and recording

At the beginning of an outbound call, you must read a mandatory notice that informs the client that the call is being recorded. The Platform prompts you to provide this necessary notice and collect an SOA if you don't have one already.

Once the call ends, the recording is stored in the new **Call Logs** tab within the client's record. This is where you can access and manage the client's recorded calls.

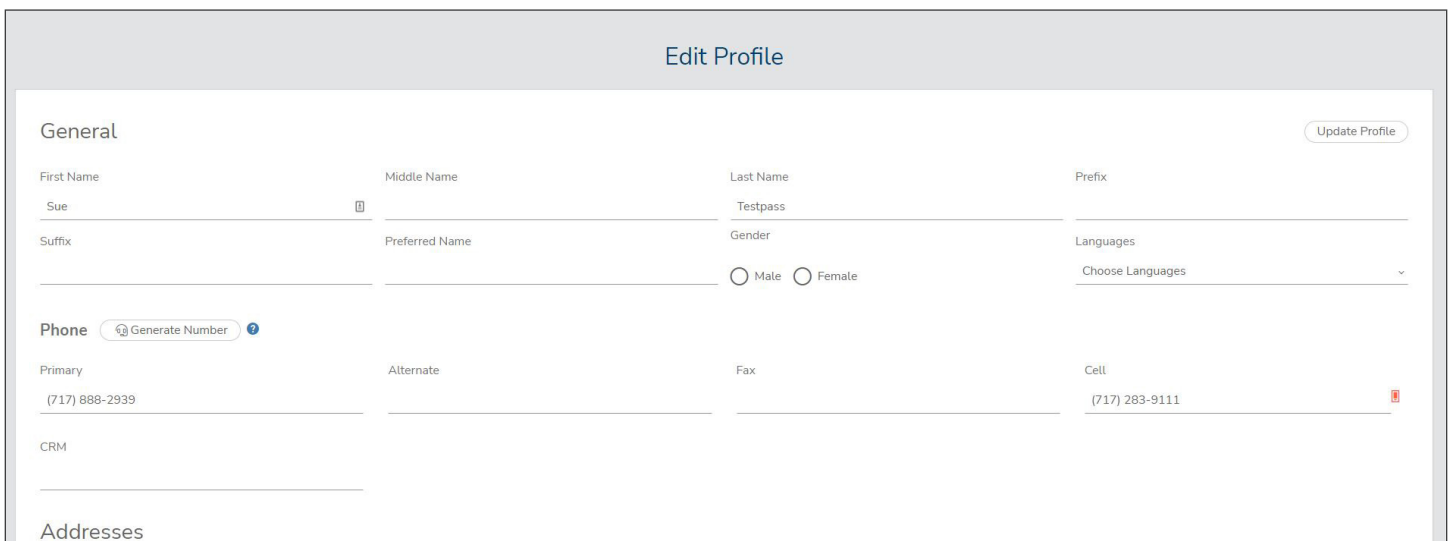


Pro tip: Load your clients' phone numbers into the **Clients** tab so you're prepared to quickly use **CallVault** for outbound calls!

Receiving Inbound Calls via a Generated Number

Recording your inbound calls is just as easy, if not easier, than outbound! All you need is to do is generate your **CallVault** phone number.

Once logged into the Platform, access your agent profile by clicking your name in the top-left corner of the page. Select **Edit my Profile** and click the **Generate Number** button.



Any time a client dials this generated number, a recording is started upon answering the call. Once the call is closed, the recording is stored in the **Calls** tab located at the top of the Platform's main view. All inbound call recordings are located here and **not automatically assigned** to a client. Because of this, it's essential that you keep your **Calls** tab organized and assign recordings to their prospective client as soon as possible. Doing so is quick and easy:

1. Enter the **Calls** tab
2. Click on the **Arrows** icon next to the recording and search for the client
3. The call recording will then be moved to the **Call Logs** tab within the client's record

If the call is from a new client who doesn't have a client record yet, click the **Person** icon to create a new record.

Additionally, you can assign and reassign this number to forward ring to any number within your Platform profile, such as your mobile or office number.



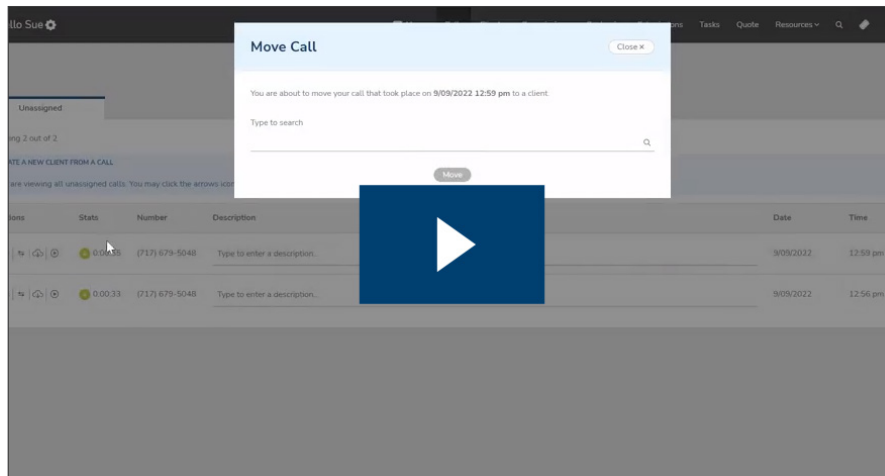
Pro tip: *Be sure to update your marketing materials to feature your **CallVault** phone number!*

Please note that, should a client call you via a phone number other than your generated **CallVault** number, the call will not be recorded and stored in the **Platform**. Should this happen, you can either:

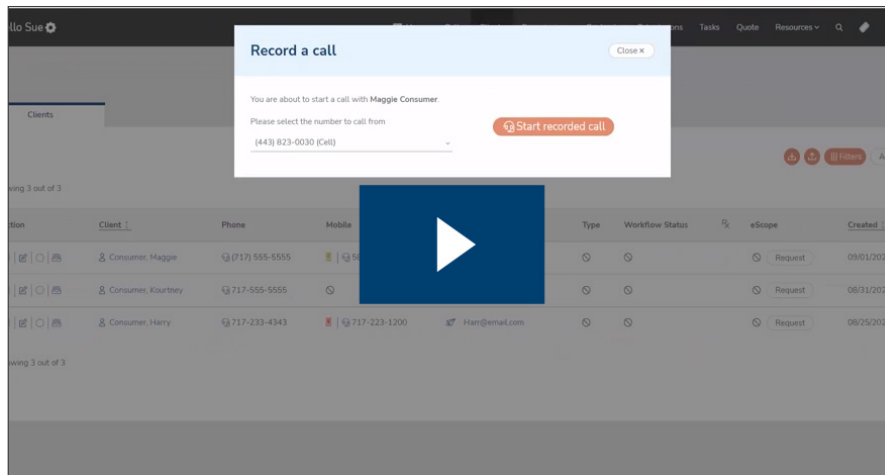
- Call the client back from the Platform following the **CallVault** outbound process
- Politely ask the client to hang up and call you back using your **CallVault** number

Check out our helpful videos to see inbound and outbound calls with **CallVault**!

Inbound



Outbound



Tips for Using CallVault Like a Pro

Your business runs on your processes, like how you collect Scopes of Appointment and enrollments, run your client meetings, and more. Using **CallVault** on the [Ritter Platform](#) will be no different!

The key to success for using this tool is to establish a set method you stick by.

Here are some of our best practice recommendations that can ensure your Medicare product sales during the Annual Enrollment Period don't skip a beat!

CallVault Is Designed to Work For You

This user-friendly feature within the Ritter Platform can record and securely store all *outbound* and *inbound* calls with clients. **CallVault** is equipped to work for you, as it can automatically add your Medicare call recording to [your client's record](#), unlike services like Google call recording, putting you a step ahead.

Both the [outbound](#) and [inbound](#) recording features are simple to use, but like everything new, you'll need to get the hang of it and create your own **CallVault** workflow!

Familiarize Yourself with the Tool

The last thing you want is to be stumbling around the call recording process when trying to connect with a client. Do some test calls with family or friends (or [Ritter employees!](#)) to make sure you have the process down.

It's also a good idea to load your clients' phone numbers into the **Clients** tab of the Platform so you're prepared to make an outbound call promptly!

If questions arise along the way as you start using **CallVault**, be sure to check out our [CallVault FAQs!](#)

Use Direct Numbers

You will not be able to do outbound call recording if your number has an extension tied to it.

If you have not generated your custom inbound phone number, you will be prompted to choose a phone number to call from. Once your custom number has been generated, the call will originate from the number you set in your profile.

Know How to Switch the Phone Number Tied to the System

If you're in the office, have the office phone be set to record calls. When you're on the road, switch it to your cell phone.

You can assign and reassign this number to forward ring to any number within your Platform profile, such as your mobile or office number.

Focus on Outbound Calling First & Inbound Calling Second

Outbound calling allows you to control when calls are recorded, lets you prepare the client, and provides a better experience for when clients first call you.

While we're pleased to also provide you with a seamless inbound process, the client will initially hear an automated recording which could make them think call center, rather than local independent agent.

Explain Why the Calls Must Be Recorded

This is for the clients' protection and your protection. Let them know you understand it's a hassle, but it's a government requirement and the same requirement will exist no matter whom they call for their Medicare review.

Also remember to read the CMS-required script to your client first thing once your connected with a client on the recorded line.

Use Inbound Call Recording When You're Out in the Field

If you're driving when your client calls you, the easiest thing to say is "call me back on my recorded line."

It's essential that you memorize your inbound line for this exact scenario.

Market Your New Inbound Number or Forward Your Preferred Line to Your Inbound Number

To avoid asking a client to call back, you can ensure your call is being recorded by providing your clients with your inbound number or forwarding the number they have saved for you to that inbound number.

Generating your inbound number is a one-time process and once created, it's what you'll give to clients to allow them to communicate with you on a recorded line. This number may be included on websites, emails, business cards, printed materials, etc. for clients to contact you.

Be Ready to Meet Face to Face

One reason clients have preferred independent agents over call centers has been the concept of the "kitchen table plan presentation." If someone isn't comfortable being recorded, tell them you're more than happy to meet with them in person, either at their home or somewhere they feel comfortable.



CallVault FAQs

Do you have questions about recording and storing your Medicare calls with **CallVault**? Good news — we have answers!

Below, we're answering some frequently asked questions on the Ritter Platform's newest feature, **CallVault**. For the most up-to-date FAQs to Medicare call recording and **CallVault**, [read our post on the Ritter blog](#).

General Questions

When do CMS' Medicare call rules go into effect?

These rules went into effect on October 1, 2022. The clarification that this applies to calls related to sales, marketing, and enrollment (including retention-based marketing) went into effect on September 30, 2023.

What plans and products fall under the Final Rule from CMS?

Medicare Advantage Prescription Drug (MAPD), Medicare Advantage (MA), and Part D prescription drug plan (PDP) products fall under this rule for TPMO sales call recording.

What if a Medicare Supplement product presentation and sale turn into an MAPD, MA, or PDP presentation and sale?

The Medicare Supplement sales presentation does not require call recording. However, if the call pivots to discuss MAPD, MA, or PDP options, a recording of the call must be started immediately.

Do in-person MAPD, MA, and PDP appointments and sales need to be recorded?

No. In-person meetings and sales do not need to be recorded.

Is there a cost for using CallVault?

No. The **CallVault** compliant call recording feature is available today to all agents registered with RitterIM.com.

Is there a step-by-step guide to using CallVault?

Yes. You can find detailed step-by-step instructions in the “**CallVault**: How Does It Work?” section of this guide or on our [Docs Site](#) (requires login to RitterIM.com).

Using Your Generated Inbound CRM Number

What is a CRM number?

This number, which may also be referred to as your generated inbound number, is a number you create through a one-time process in the Platform. Any call received at this number will be recorded by the **CallVault** system. Upon creation of this number, you will assign which phone number you'd like receive inbound calls at. The assigned number can be changed at any time.

Do I need to distribute the CRM number to my clients?

Yes. You will want to distribute the inbound CRM number to your clients. Inbound calls will only be recorded if the beneficiary initially calls the CRM number.

Are inbound callers told they are being recorded?

Yes. When someone calls your CRM number, they will hear a recorded message that the call is being recorded. This message will also be captured in the call recording.

Please note: As of October 1, 2023, the TPMO disclaimer is no longer automatically announced due to the dynamic nature of the disclaimer.

If A Client Refuses Recording

Is an opt-out available if my client doesn't want the call recorded?

No. If a client doesn't want to be recorded, you must organize an in-person meeting.

If a consumer requests not to be recorded, you should end that call with the beneficiary and attempt another compliant outreach (via email with opt-out function or via direct mail, for example) to set-up an in-person sales meeting. While there is not a standardized script to be said when a client refuses to be recorded, a verbiage recommendation is offered when using **CallVault** for outbound calls.

What is the penalty if MAPD, MA, PDP calls are not recorded?

Penalties will vary based on the carrier. If the carrier finds repeated violations of this rule, it is the carrier's discretion to exercise any disciplinary actions, including the termination of the agent's contract. CMS may take direct actions in extreme cases that may involve the state insurance department. In which case, the state may take the ultimate action, including revocation of the agent's license.

Provided Disclaimer Scripts and Verbiage

Is there a script or wording I must read to clients before proceeding with the recorded call?

Yes. The CMS-required TPMO disclaimer script will pop up in the Platform once an outbound recorded call has begun.

The standardized TPMO disclaimer depends on how many plans you represent within a given geographical location.

If marketing fewer than all plans within a service area, use:

"We do not offer every plan available in your area. Currently we represent [insert number of organizations] organizations which offer [insert number of plans] products in your area. Please contact Medicare.gov, 1-800-MEDICARE, or your local State Health Insurance Program (SHIP) to get information on all of your options."

If marketing all plans within a service area, use:

"Currently we represent [insert number of organizations] organizations which offer [insert number of plans] products in your area. You can always contact Medicare.gov, 1-800-MEDICARE, or your local State Health Insurance Program (SHIP) for help with plan choices."

For more information on when to use this disclaimer, please review our [TPMO blog post](#).

Storage of Recorded Calls

Where are the call recordings stored and how will I have access?

Outbound CallVault recorded calls are stored within a **Call Logs** tab in the client's record on the Ritter Platform.

Inbound CallVault recorded calls are stored within the **Calls** tab of the Ritter Platform. From there, all recordings must be assigned to the appropriate client record.

Your call recordings made using **CallVault** can be downloaded from the Ritter Platform. Regardless of any individual export from **CallVault**, copies of the recordings will be stored in the Ritter Platform for 10 years as required by CMS. If exporting, you are responsible for ensuring the recorded files are secured to meet HIPAA privacy/security requirements and meet CMS' 10-year record retention requirement.

How long will the calls be stored?

In accordance with record retention guidelines and requirements, all recorded calls are stored for 10 years.

What kind of protections are there for these recordings?

Ritter ensures the security of all recordings made through **CallVault** on the Ritter Platform. [Review the security statement](#) of our third-party partner, Twilio.

Technical Questions

How do I assign my unique **CallVault** inbound CRM number to forward to my office or cell phone?

You may assign your **CallVault** number to forward to any of the numbers in your Ritter Platform profile. [See detailed instructions on Docs](#) (login required).

Can I select to record a call if a consumer calls my mobile number?

No. The inbound call must come through the inbound CRM number in order to be recorded by **CallVault**.

What if I experience technical issues during a call?

While we cannot guarantee that there will be no issue, we don't anticipate an issue with the recording capture or storage. Should an issue occur, you can contact your [Ritter sales specialist](#) for support and issue escalation.

Who is ultimately responsible if a call is not recorded: the carrier, field marketing organization (FMO), or agent?

Ultimately, you, the agent, are held responsible. The carrier has the oversight, and thus, agents are required to submit the required recorded calls in the event of an audit or a member grievance.

Can **CallVault** be used for all carriers, even carriers I'm partnered with through other FMOs?

Yes. While the Platform is optimized for agents to manage clients who have enrolled through [Shop & Enroll](#), all calls started through the Platform or received at your inbound number generated through the Platform will be recorded. These recordings can be linked to your client's record and reviewed and downloaded regardless of the outcome of the conversation.

The recording done using **CallVault** does not have to end in the sale of a product that you are appointed with through Ritter (although we'd appreciate it!). We do ask that agents only use our system if they plan on selling products through us.

[**See More CallVault FAQs Here**](#) »»

We're eager for you to use **CallVault** and find out how easy it is to adhere to the call recording mandate. Meeting the expectations and guidelines of CMS is imperative and that's why we're dedicated to making sure you have reliable tools available to help you do so. If you're not partnered with us yet, registering on RitterIM.com is simple and free and unlocks this feature and so much more!

Register with Ritter



Have a question that wasn't answered here? Reach out to your [Ritter sales specialist](#). Also, be sure to check out [Ritter Docs](#) for more helpful info!

*The **CallVault** compliant call recording feature is available **today** to all agents registered with RitterIM.com. For agents contracted and producing through Ritter, there is no cost to use this service.*

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